

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., DEMOCRACY
NASHVILLE-DEMOCRATIC
COMMUNITIES, THE EQUITY ALLIANCE,
and THE ANDREW GOODMAN
FOUNDATION,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee, HERBERT SLATERY III, in his
official capacity as Attorney General of the
State of Tennessee, the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, GREG DUCKETT,
MIKE MCDONALD, JIMMY WALLACE,
TOM WHEELER, and KENT YOUNCE, in
their official capacities as members of the State
Election Commission,

Defendants.

Case No. 3:19-cv-00365
Judge Aleta A. Trauger

**PLAINTIFFS' MOTION TO EXTEND TIME TO FILE OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

Plaintiffs, Tennessee State Conference of the N.A.A.C.P., Democracy Nashville-
Democratic Communities, The Equality Alliance, and The Andrew Goodman Foundation, by
and through counsel, respectfully submit this Motion seeking a brief, three-day extension of time
to file their opposition to Defendants' motion to dismiss until June 20, 2019.

On May 2, 2019, Plaintiffs filed their Complaint in this matter (Doc. 1). On June 3, 2019, Defendants filed a Motion to Dismiss (Doc. 21) and a Memorandum of Law in Support of the Motion to Dismiss (Doc. 22). Pursuant to the Local Rules, Plaintiffs' Opposition to Defendants' Motion to Dismiss is currently due Monday, June 17, 2019.

Plaintiffs request this extension in order to ensure that their Memorandum to be submitted to the Court addresses the numerous issues raised by Defendants in their Motion to Dismiss in a way that is as clear, thorough, well-organized and as beneficial to the Court as possible. Additionally, many of the issues raised in Defendants' Motion to Dismiss are similar to, if not the same as, the issues raised in the Motion to Dismiss filed by Defendants in *League of Women Voters of Tennessee v. Hargett*, No. 3:19-cv-00385. Plaintiffs respectfully suggest that it would make sense from the Court's perspective for the briefing in these two parallel cases to proceed on the same schedule.

Counsel for Plaintiffs contacted counsel for Defendants on June 16, 2019 to request Defendants' consent for an extension of time to file their Response to the Motion to Dismiss until June 20, 2019. Plaintiffs have not heard from Defendants.

Based on the foregoing, Plaintiffs request an extension of time until June 20, 2019 to file their Response to Defendants' Motion to Dismiss and that the Court enter the Proposed Order attached hereto as Exhibit A.

Respectfully submitted,

/s/ Taylor A. Cates

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**pro hac forthcoming*

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CERTIFICATE OF SERVICE

I do hereby certify on the 17th day of June 2019 that a true and correct copy of the foregoing document was transmitted via the Court's ECF/CM system to the following:

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